

Iowa Balance of State Continuum of Care
2014 Proposed Project Application Materials

Public Comments Received

Written comments were accepted by email by the extended deadline of 4:30 p.m., September 10, 2014. Verbal comments were accepted during a meeting at 7:00 a.m., September 3, 2014, at the Marriott Hotel, Des Moines. Attendees at this meeting: Zeb Beilke-McCallum, Ben Brustkern, Carrie Dunnwald, Julie Eberbach, Dennis Lauterbach, Tony Timm; staff: Amber Lewis. Written comments are noted; all other comments were verbal. Verbal comments are summarized for brevity. Comments are organized by general topic.

(Updated 9/16/14 with final comments)

Overall comments:

- 1) “Overall, the biggest challenge with the approach laid out in this proposed application is that it isn’t necessarily based on shared community values. The ideal circumstance is to get to where everyone agrees on some guiding principles. Other than that, it meets the activity goals of the funder (HUD). The process is sound. The application looks fine. The timeline is what it needs to be, other than the 2013 application scores from HUD not being out yet, so we may have more time.” –Julie Eberbach
- 2) (Added on 9/16/14): “Would it be possible, without causing detriment to the Balance of State submission as a whole, to keep the 2014 application, scoring and ranking process consistent with the 2013 competition and to not implement such substantial changes as currently proposed until the 2015 competition? Even with an extended timeline for the 2014 competition the types of changes programs would be required to make to be competitive are not the types of changes that are successfully and planfully made in the sort-term.

The application priorities, scoring, and ranking as currently proposed will ultimately result in very significant cuts to programs with little to no time to prepare either within our organizations or across our communities. This feels inconsistent with both the work and the approach the Council is trying to advance to build a system’s based approach to homeless services provision. I appreciate and support the necessary changes in project prioritization over a longer timeline. However it would be a healthier and more constructive process if this were the recommendation for the 2015 funding cycle. With more time to prepare and plan we would have the opportunity to proceed with a more collaborative and deliberative approach in partnership with the ICH’s Continuum of Care Committee, our regional HUD office and partner agencies. We could work together to discuss reallocation, change in project type and scope, the ins and outs and how best to work within HUD’s own processes so as not to expose ourselves to

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unnecessary risk, etc.. This type of time and energy invested on the front end of the process would go far in building a greater sense of transparency, partnership, and trust as we move forward.

On behalf of Shelter House, we are serving hundreds of people through our Supportive Services Only program and are consistently achieving some of the highest performance outcomes related to housing placement, employment placement, and accessing other income sources. As such I would echo comments made by my colleagues regarding a look to historical rankings and consistency in performance. Shelter House would if necessary consider changing the program type and would welcome the opportunity to work planfully with others to do this. But it would require time.” –Crissy Canganelli, Shelter House (written comment)

Proposed 2014 Application Timeline

- 3) “On behalf of Opening Doors here are our comments about the CoC Application Materials: We are concerned about the time-frame of the conference call, which is taking place on 9/17/14. The narrative is due the day before this conference call takes place and the application is due in esnaps the day after the conference call. It would be preferred to have additional time between this informative conference call and when the application is due. Considering there is also a holiday weekend, we feel this does not give us a great deal of time to complete this. In addition to this, many are attending a Awesome Town housing conference in Des Moines next week and will be gone the bulk of the week.” -Amy Schauer, Opening Doors, Dubuque (written comment)
- 4) “Agencies can’t complete the Esnaps application if HUD hasn’t opened the competition, so the proposed timeline may not fit with this. HUD continues to delay; we still don’t have the 2013 scores or debriefing, and HUD won’t open the 2014 competition until this part is done. Additionally, once HUD opens the competition, they almost certainly will allow at least 45 days. I would suggest to extend the comment period another week, and extend the timeline overall.” – Julie Eberbach
- 5) “The timeline was proposed in order to fit with the September council meeting. If we extend the timeline, we need to hold a special council meeting to vote on the applications and ranking. If we do this, we should establish a date soon in order to provide as much notice as possible.” – Zeb Beilke-McCallum

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Proposed 2014 Project Funding Levels Based on Ranking

- 6) "If a project is not spending at least 80 or 90% of a grant, that's an indication of something wrong. But getting down to the final \$1,000 or \$2,000 is different. Sometimes there are factors outside the grantee's control. I suggest a 10% cushion for agencies that didn't quite spend all their funds. Above that 10%, any unspent funds should be reallocated for a possible new project." –Ben Brustkern
- 7) "HUD allows grantees to move up to 10% of funds between categories without a grant amendment, so a 10% cushion is consistent with this." – Julie Eberbach
- 8) "The Continuum of Care Committee originally asked for a 10% cushion a couple years back when HUD first required CoC-wide cuts, so a 10% cushion this year would be consistent with past goals of this committee. Last year was different because HUD's required 5% CoC-wide cut was larger. For last year, the Council voted to go even farther and reallocate all unspent funds, without allowing any cushion at all. I would suggest that the council vote to institute a 10% cushion for this year and going forward, to develop a consistent approach." –Zeb Beilke-McCallum
- 9) "The proposed reduction amounts at the bottom of the ranking could severely impact a program. An alternative would be to look at scoring history, so the ranking isn't all based on this one application—especially because this year's proposed application is quite different from last year's." –Ben Brustkern
- 10) "As part of the process in Des Moines that helped develop Barbara Poppe's recommendations for scoring/tiering, the idea behind this is to ease programs out, rather than cut them off abruptly. The process sets programs up to reapply as an entirely new project in the future." – Julie Eberbach
- 11) (Added on 9/10/14): "Is there a comment sheet from last year's CoC competition that shows why projects were scored the way they were? It would help if we were able to see the comments and why points were lost or not awarded. It's hard to improve when you don't know why something scored the way it did." – Mariligh Fisher, Community Housing Initiatives (written comment)

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- 12) (Added on 9/10/14): "In reviewing and assigning points for each of the questions in the CoC Competition Project Narrative, how will the actual number of points earned be determined? Will there be partial points earned for meeting some of the requirements and how will this be determined?"
- 13) Our projects serve unaccompanied homeless children and youth up through the age of 24. HUD recognizes this as a significant population representing roughly 8 percent of the total homeless population. Transitional living services are needed for these youth to learn basic life skills to help them move towards more self-sufficiency and permanent housing situations. The project application seems to overlook these populations and the value of providing services to prevent long-term chronic homelessness. Thank you for the opportunity for input." –Roberta Milinsky, Youth and Shelter Services (written comment)
- 14) (Added on 9/16/14): Project Level Funding: There is a wide disparity in the amounts of money that would be recaptured by the formula that is proposed. These funding levels could effect a program in a negative way that it would no longer be able to meet its HUD submitted application. A program that receives a higher grant amount is hurt more than those with low grant amounts. I would consider a threshold of scoring level that when reached would remove that program from receiving a cut whether it was in the bottom nine programs or not. Example if baseline scoring should meet 80 points if that threshold is met the program should not be cut based on scoring.
- Why would the committee consider continuing support of a program that would not be able to meet its HUD contract after funds have been recaptured or is unable to be effective within the community because it has received a large cut in resources. This would lead to the program remaining ineffective." –Ben Brustkern, Cedar Valley Friends of the Family (written comment)
- 15) (Added on 9/16/14): "1. Suggest addressing late applications in the policy so that it is clearly stated - Especially how late applications can rank above others that submitted in a timely manner. HUD normally rejects late applications.
2. Would like to see some policy that could adjust for funding levels in cases where projects have made improvements and are spending 100% of the grant for the current year rather than relying solely on old information- taking into consideration the effect of homeless individuals/families that would be placed in a homeless situation again should funding be cut, as well as, the improvements made to the project. Due to the timing of reports, often ranking/funding is made on old data- perhaps there could be a way to show how the funding is on track to meet all goals during the appeal process and considered in a more positive

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manner. Sometimes the first grant is difficult to work through all the logistics and needs time to grow- so the renewal funding could take into consideration those details.

3. If a renewal project is not being funded completely, it would be helpful for that recipient to receive a written notice to explain the decision- as well as, throughout the appeals process, it would be helpful to receive feedback including suggestions to improve.

4. How is a renewal project able to access a higher funding level if there is a need? Would renewals be able to increase funds before additional amounts are available for New Project funding?

5. Concerned about the E-snaps project application deadline when it is dependant upon availability from HUD.

Additionally, I'd like to say that I completely understand the difficulty of ranking projects based upon paper documents; however, there is a real element at stake- those of the individuals and families that we all work with, so I'd like to also commend all those in Iowa that makes our state special because we have so many dedicated staff persons and volunteers to make those "paper" projects a reality in people's lives." –Janet Walker, City of Dubuque (written comment)

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- 16) "In looking over the draft of the upcoming HUD CoC application question #15 addresses taking drawing down from the grant funds at least quarterly, to my knowledge we have not yet been given a grant number to use for this year's funds." -Sarah Hood, YWCA, Clinton (written comment)
- 17) "For Question #15 about timing of drawdowns, add in "upon execution of your contract," in order to make clear that an agency won't be penalized for a late contract from HUD." –Tony Timm and Carrie Dunnwald
- 18) "We have questions about the bonus for voluntary reallocation. We have received confusing messages from HUD. Our HUD field rep has said to work with them on grant changes, rather than going through reallocation. It seems riskier to do this through the competition." –Carrie Dunnwald
- 19) (Added on 9/10/14): "If someone is applying for a new program, is the draft application all they would fill out besides the information in e-snaps or is there another form that we didn't get?" (clarification requested)– Mariligh Fisher, Community Housing Initiatives (written comment)

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20) (Added on 9/16/14): “Bonus for voluntary reallocation: If a program was not scoring well why would it be allowed to gather 10 bonus points by reallocating the project. This does not necessarily mean that the program will be any more effective in providing services it just changes the type of services provided.

Project Design:

2) Prioritization to chronic homeless- This question will put rural programs at a disadvantage within the competition. We need to make sure that rural and urban populations can access services if needed.

3) Emergency Shelters- Many programs do not have access or run a shelter in their service area. Many clients also will not travel to access a shelter. Communities without homeless shelters will score lower even though they may be providing quality services. The questions should be how are programs prioritizing even if they do not have an emergency shelter in the area.” –Ben Brustkern, Cedar Valley Friends of the Family (written comment)
